

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS**

TEXAS TOP COP SHOP, INC., ET AL., Plaintiffs, v. MERRICK GARLAND, ATTORNEY GENERAL OF THE UNITED STATES, ET AL. Defendants.	CIVIL ACTION NO.: <u>DECLARATION OF LINDA SCHNEIDER</u>
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DECLARATION OF LINDA SCHNEIDER

I, Linda Schneider, make the following declaration under penalty of perjury pursuant to the laws of the United States:

1. I am over the age of 18, am under no legal disability, and am competent to testify. If called as a witness, I would and could testify competently to the facts set forth in this declaration based on my personal knowledge.

2. I am the Corporate Representative of Texas Top Cop Shop, Inc. ("Texas Top Cop Shop"), one of the plaintiffs in this action.

3. Texas Top Cop Shop is a corporation organized under the laws of Texas and registered with the Texas Secretary of State since 2017. Texas Top Cop Shop is a member of the National Federation of Independent Business, Inc. ("NFIB").

4. Texas Top Cop Shop is a family-run business that operates a single retail storefront in Conroe, Texas, which sells uniforms and equipment for first responders, such as police officers and emergency services personnel.

5. Texas Top Cop Shop sells its merchandise locally, does not sell any items out of state or through the internet.

6. Texas Top Cop Shop has four employees, including its owners.

7. Texas Top Cop Shop is a licensed dealer of firearms. To obtain such a license, its owners were thoroughly investigated and determined to be law-abiding U.S. citizens.

8. Texas Top Cop Shop has designated a registered agent and office location with the Texas Secretary of State, but has not disclosed the identities of each of its shareholders and beneficial owners.

9. As a pre-existing corporation registered with the Texas Secretary of State, Texas Top Cop Shop would be required to comply with the Corporate Transparency Act (“CTA”), and must file beneficial ownership reports with the Financial Crimes Enforcement Network (“FinCEN”) before January 1, 2025.


10. Texas Top Cop Shop would be forced to incur compliance costs should it file the required reports, including the cost of legal services related to reviewing relevant records and filings.

11. Texas Top Cop Shop has not filed any beneficial ownership reports with FinCEN, and does not intend to disclose the identities of its beneficial owners (as defined by the CTA) absent a judicial declaration that it is required to comply with the CTA and its implementing regulations, because Texas Top Cop Shop objects to the Act’s intrusion into state sovereignty, restriction on First Amendment rights, and invasion of private papers and effects protected by the Fourth Amendment.

12. Texas Top Cop Shop advocates for the repeal of the CTA, but does so as a corporate entity, in part, to protect the associational privacy interests of its beneficial owners.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on May 24, 2024


Linda Schneider